

From: **jason su** <jason.g.su@gmail.com>
Date: Mon, Oct 16, 2023 at 12:55 PM
Subject: Public Comment on Oakland Airport Draft EIR.
To: <TermDev@portoakland.com>

Dear Port of Oakland,

I have yet to receive confirmation of the public comments I submitted via <https://www.oaklandairport.com/terminaldevelopment/get-in-touch/>. To ensure that my input is duly recorded, I am submitting my public comment through this email.

Response to “Human Health Risk Assessment Technical Report”:

The report displays an unwavering bias in favor of the Oakland Airport's modernization and expansion project, to the point that it reads more like a promotional pamphlet than an objective, independent scientific assessment. True scientific reports should maintain a neutral stance while conducting human health risk assessments.

It is perplexing to note that the report initiates by referencing human health risk thresholds before even conducting a proper risk assessment. This seemingly prejudicial approach immediately raises doubts about the objectivity of the report. Notably, BAAQMD is primarily an air quality management district, not a public health institute, and it lacks the authority to establish health risk thresholds. Any claims regarding the existence of such thresholds should be supported with credible scientific evidence, which, to my knowledge of 20 years of environmental health research, does not exist for cancer health risks attributable to air pollution.

Furthermore, the omission of respiratory risks arising from air toxics is a glaring oversight, as these factors are instrumental in gauging the true scale of the project's impact. The use of non-performance dispersion models also casts doubts on the reliability of the reported concentrations, as they can deviate significantly from actual measurements. Transparency in reporting the model's accuracy concerning ground measurements specifically attributable to airport operations is imperative.

The study's widespread receptors placed around the airport appear to dilute the true impact. A more meaningful analysis should define and assess the effects on vulnerable communities, which bear the greatest burden. The evaluation should focus on the impact of the project on these communities, rather than diluting the results with broader population data.

The method of comparing incremental human health risks to baseline (2019) is problematic. It disregards the dynamic impact of the project on human health. It is essential to report health risks annually and, if using incremental risks, to compare them with those from other sources like traffic and industrial emissions. Considering the significant overall reduction in air pollution levels across sectors in the last two decades, the project's incremental health risks should surpass those from other sources to justify

its continuation.

Response to “Air Quality” Assessment:

The air quality assessment report heavily relies on data from regulatory air quality monitoring stations, with the nearest station, mistakenly labeled as "Oakland East" (should be “East Oakland”), located 4.4 km away from the North Field. The second station at Laney College is even further at 9.0 km, and the third station, erroneously labeled as "Oakland West" (should be “West Oakland”), is over 10 km away. These monitoring stations' substantial distance from the airport raises doubts about their representativeness regarding the true impact of air traffic.

Of particular concern is the fact that the data from these monitoring stations predominantly reflect the influence of local roadway traffic, failing to adequately capture the potential effects of air traffic. For instance, NO_x pollution, which tends to have a localized impact, significantly affects areas within a radius of less than 500 meters. Given that NO_x concentrations from aircraft can exceed 100 ug/m³ or over 50 ppb, while typical roadway NO_x levels in the San Francisco Bay region remain below 30 ppb, it is clear that the measured NO_x concentrations are more indicative of local road traffic than air traffic.

To directly address the health impacts of air and noise pollution from air traffic, the Port of Oakland should consider installing air quality and noise monitors on the rooftops of the Bay Farm Elementary School buildings. These structures lie directly beneath the flight path of the North Field and such air quality and noise measurements would provide long-term evidence of the airport's compliance with air and noise pollution regulations and demonstrate a genuine commitment of the Port of Oakland to public health.

Sincerely,
Jason G. Su

A resident in Bay Farm Island